

21

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Temekia M. Wyckoff

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

v.

R1 RCM Inc.,
401 N. Michigan Ave., Suite 2700,
Chicago, IL 60611
c/o Joseph Flanagan-President & Chief Executive
Officer

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case:2:19-cv-13633
Judge: Lawson, David M.
MJ: Patti, Anthony P.
Filed: 12-10-2019 At 02:43 PM
CMP WYCKOFF V R1 RCM INC, ET AL (af
)

Jury Trial: ☒ Yes ☐ No
(check one)

Complaint for Employment Discrimination

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Temekia M. Wyckoff</u>
Street Address	<u>PO Box 563</u>
City and County	<u>Southfield, Oakland</u>
State and Zip Code	<u>MI 48037</u>
Telephone Number	<u>313-468-0673</u>
E-mail Address	<u>mswyckoff1017@aol.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Amanda Vanthomme</u>
Job or Title (if known)	<u>Manager</u>
Street Address	<u>26533 Evergreen Rd.</u>
City and County	<u>Southfield, Oakland</u>
State and Zip Code	<u>MI 48076</u>
Telephone Number	<u>248.327.1530 (office) 810.841.6476 (cell)</u>
E-mail Address (if known)	<u>avanthomme@r1rcm.com</u>

Defendant No. 2

Name	<u>Katie Guffy</u>
Job or Title (if known)	<u>Senior Ops Lead</u>
Street Address	<u>26533 Evergreen Rd.</u>
City and County	<u>Southfield, Oakland</u>
State and Zip Code	<u>MI 48076</u>
Telephone Number	<u>248.242.9420 (office) 248.860.3895 (cell)</u>
E-mail Address (if known)	<u>kguffy@r1rcm.com</u>

Defendant No. 3

Name	Medina Dizdarevic
Job or Title (if known)	Supervisor
Street Address	26533 Evergreen Rd.
City and County	Southfield, Oakland
State and Zip Code	MI 48076
Telephone Number	248.436.0747 (office) 586.873.9355 (cell)
E-mail Address (if known)	MDizdarevic@R1RCM.COM

Defendant No. 4

Name	Alicia McKinney-Gordon
Job or Title (if known)	Senior Ops Lead
Street Address	26533 Evergreen Rd.
City and County	Southfield, Oakland
State and Zip Code	MI 48076
Telephone Number	248-436-0376 (office) 313-333-0421 (cell)
E-mail Address (if known)	agordon@r1rc.com

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name	R1 RCM
Street Address	26533 Evergreen Rd.
City and County	Southfield, Oakland
State and Zip Code	MI 48076
Telephone Number	312-496-7709

Defendant No. 5

Name	William Beierwaltes
Job or Title (if known)	VP of Operations
Street Address	26533 Evergreen Rd.
City and County	Southfield, Oakland
State and Zip Code	MI 48076
Telephone Number	
E-mail Address (if known)	wbeierwaltes@r1rcm.com

Defendant No. 6

Name	Jennifer Van De Velde
Job or Title (if known)	Manager (Medicare)
Street Address	26533 Evergreen Rd.
City and County	Southfield, Oakland
State and Zip Code	MI 48076
Telephone Number	
E-mail Address (if known)	jvelde@r1rcm.com

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name	R1 RCM
Street Address	26533 Evergreen Rd.
City and County	Southfield, Oakland
State and Zip Code	MI 48076
Telephone Number	312-496-7709

Defendant No. 7

Name	Joseph Flanagan
Job or Title (if known)	President & Chief Executive Officer
Street Address	401 N. Michigan Ave., Suite 2700
City and County	Chicago, Cook
State and Zip Code	IL, 60611
Telephone Number	
E-mail Address (if known)	JFlanagan@r1rcm.com

Defendant No. 8

Name	Kate Sanderson
Job or Title (if known)	EVP, Human Resources
Street Address	401 N. Michigan Ave., Suite 2700
City and County	Chicago, Cook
State and Zip Code	IL, 60611
Telephone Number	
E-mail Address (if known)	KSanderson@r1rcm.com

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name	R1 RCM
Street Address	26533 Evergreen Rd.
City and County	Southfield, Oakland
State and Zip Code	MI 48076
Telephone Number	312-496-7709

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☒ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Other federal law *(specify the federal law)*:

- ☐ Relevant state law *(specify, if known)*:

- ☐ Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☒ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☐ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☒ Other acts (*specify*):

I am filing a complaint with the Federal Court after my discharge from EEOC with regards to race and age discrimination, harassment and retaliation charges. The above names played significant roles in each of these charges.

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s) Discrimination acts started February 2018 to present day

C. I believe that defendant(s) (*check one*):

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

- ☒ race Black
- ☒ color Black
- ☐ gender/sex _____
- ☐ religion _____
- ☐ national origin _____
- ☒ age. My year of birth is 1970. (*Give your year of birth only if you are asserting a claim of age discrimination.*)
- ☐ disability or perceived disability (*specify disability*) _____

E. The facts of my case are as follows. Attach additional pages if needed.

Please see attachment

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

May 14, 2019

- B. The Equal Employment Opportunity Commission *(check one)*:

- ☐ has not issued a Notice of Right to Sue letter.
☒ issued a Notice of Right to Sue letter, which I received on *(date)*

September 19, 2019

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

- ☒ 60 days or more have elapsed.
☐ less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. Attach additional pages if needed.

I am requesting to receive exemplary damages in the amount of \$300,000.00 for refusing a promotion three separate times because of the color of my skin and my age. I have been subjected to continued harassment and bullying by leadership regarding my personality and my ability to fight back by filing a complaint through the EEOC. I was given a false yearly evaluation which resulting in me not receiving my full raise. I have endured these discriminating behaviors for more than one year which has caused me mental anguish. R1 leadership continue to practice in malicious behavior and disregarding my rights as a human being and a citizen of the United States of America.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: December 10, 2019.

Signature of Plaintiff

Printed Name of Plaintiff Terrekia M. Wyckoff

Additional Information:

My name is Temekia M. (Michelle) Wyckoff; I currently work for R1 RCM of Southfield, MI (26533 Evergreen Rd, Southfield, MI 48076). Currently I work as a Follow-up Representative as of January 30, 2017. The corporate office address is: R1 RCM Inc., 401 N. Michigan Ave., Suite 2700, Chicago, IL 60611.

I wish to file a complaint against my current employer for age, race discrimination, harassment and bullying.

I have filed my complaint with the EEOC as of May 14, 2019; my Charge number is **471-2019-3071**. My case was discharged as of September 19, 2019 and I received my Right to Sue letter with the same date. If R1 choose not to settle this case prior to going to trial I have spoken with two high profile attorneys who are willing to present me. However; they were not available to represent me and file this case through the Federal Court prior to the 90-day deadline. Therefore; currently, I am representing myself, Pro Se Litigant.

R1 practice on promoting those who are in their 20's and 30's and white; if they decide to promote a black employee their also, younger than 40. The leadership of R1 has done nothing less than continuously harass me, they have attempt to belittle my personality and the bullying will not stop with R1 leadership.

I have been employed with R1 since January 30, 2017 and I have exceeded all the expectations of R1 requirements to earn a promotion and the opportunity has continued to pass me by due to my race and age. R1 practice in promoting the nonreliable younger employees and apply pressure to the older employees to a higher standard without reaping benefits of a promotion.

My race discrimination complaint started February 2018 under the following R1 leadership:

- Melissa Cox (Caucasian 30's; former manager)
- Jennifer Van De Velde (Caucasian 30's; former Senior Ops Lead. Now Jennifer Van De Velde is a manager)
- Alicia McKinney-Gordon (Black-supervisor, 30's). Alicia McKinney-Gordon started working with R1 one week prior to my start date

I was passed up for an elected promotion, Associate 3 to a young Caucasian (30's) lady, Kristina Dostert prior to her one-year tenure as of February 6, 2018.

My age discrimination complaint started March 8, 2018 with William Beierwaltes during the interview for the Supervisor position my age was referenced and asked several times during the interview. After I stated my age (47) William Beierwaltes stated "I did not look that old;" as a result I did not get the position. The position was given to a younger Caucasian lady, Kristina Dostert (9 months after she received the first promotion).

My bullying, harassment, age discrimination and retaliation complaint started August 2018 to present day under the leadership of:

- Amanda Vanthomme
- Katie Guffy
- Alicia McKinney-Gordon; she has received a promotion after harassing me; she is now a Senior-ops-Lead
- Medina Dizdarevic -current supervisor

During my 2019 yearly evaluation Katie Guffy and Alicia McKinney-Gordon was not honest with my yearly evaluation therefore; they have prevented me to receive my full 3% raise.

To give you an example of how prejudice R1 leadership are. I emailed my leadership Amanada Vanthomme, Katie Guffy and Medina Dizdarevic on July 8, 2019 titled "promotion" inquiring what can I do in order to qualify for a promotion. On July 10, 2019 I received a response from Katie Guffy pointing out that I do not qualify for a promotion because I allowed my password to expire. At this point I realized that I am under the most ridiculous and unprofessional leadership because I found myself having to address an expiration of a password which when my password expired was the same date the entire team along with Katie Guffy password expired.

On July 18, 2019 I met with Amanada Vanthomme, Katie Guffy and Medina Dizdarevic regarding my inquiry and my response. During this meeting Amanada Vanthomme stated

- **Amanada Vanthomme:** the password expiration as my 1:1 should not have played a factor with my inquiry. And it was suggested that I disregard the mentioning of the password.
- **Me:** I cannot disregard something that I have read.

Amanada Vanthomme suggested we meet again and during this meeting I am to give them reasons of what I need to do to improve about myself in order to be considered for a promotion. I have never heard of something so absurd in all my days. On July 24, 2019 I met with Amanada Vanthomme, Katie Guffy and Medina Dizdarevic and Amanada Vanthomme asked me

- **Amanada Vanthomme:** have you thought of things you feel you need to change about yourself in order for us to consider you for a promotion?
- **Me:** no, I had not given it a second thought because I emailed you, leadership this inquiry and because you choose not to answer me you turn the question back on me.

During this meeting Amanada Vanthomme, Katie Guffy and Medina Dizdarevic could not give me one reason why I did not qualify for a promotion therefore; Amanada Vanthomme decided to switch the entire subject. I then gave a smirk and Amanada Vanthomme asked me what my look was for and I responded as saying "you still did not answer my question." Amanada Vanthomme had a temper tantrum slammed her computer lip down and stormed out of the meeting.

Knowingly how terrible this company operates the attorneys of R1 emailed EEOC on August 27, 2019 inquiring "what are you seeking to resolve the case," they did not provide any rebuttal information to contradict my complaint. I must admit that my settlement demand; the request was outrageous because I had no idea what the maximum dollar amount was for my type of complaint and I did not want to under bid myself and I thought they would counter, as a result they did not. After speaking with several attorneys, I have been informed that the maximum dollar amount for my situation is \$300,000 (three hundred thousand dollars) therefore; this is my request. Unfortunaly; R1 will not discontinue their racially motivated acts against black employees especially if we are over the age of 40. I truly wish for the public to know the type of company, R1 are operating therefore; I am an active member of the NAACP and I plan on filing a discrimination complaint against R1 this week. I wanted to file my complaint with you, Federal Court first.

I can provide supporting documents that will support my complaint. After filing my original complaint with the EEOC I reached out to:

- Joseph Flanagan-President & Chief Executive Officer; located at the corporate office, Chicago, IL
- Kate Sanderson-EVP, Human Resources; located at the corporate office, Chicago, IL
- Molly Rodenbeck-VP Operations (former). William Beierwaltes now the VP of Operations; located at Southfield, MI office

I provided a copy of my complaint to the top executives of R1 in hopes that a resolution could be reached instead of going through the EEOC. As a result, that did not happen, the harassment, bullying and age discrimination continued.

Companies like R1 need to be stopped, slavery has been over since 1865 and R1 operates as slave masters and the blacks are the slaves. 1964 the Civil Rights Act ended discrimination and R1 operates in ways of bringing slavery and discrimination back. R1 is not ashamed of how they operate, R1 leadership do not try to hide, cover up or justify their hatred for blacks. And R1 leadership is relentless with their hatred towards me because I fight back; I know my rights as an US citizen and active voter and R1 leadership do not appreciate my fighting back. Instead of R1 leadership leaving me alone and allowing me to do my job successfully they continue to harass me.

Unfortunately, you have some blacks will not stand for their racial antics and fight back by filing a complaint through the EEOC or simply leave the company. And you have other black employees scared of the white man therefore; they will turn on other black employees no matter what just to stay in good favor with the white man; this is a prime example of Alicia McKinney-Gordon. All the top executives at R1 in Southfield, MI are all white and in their 30's.

I realize this is a time sensitive matter to file and my deadline to file with the Federal Court is December 19, 2019. Although; I do not have legal representation I refuse to allow the time to pass me by and allow R1 to get away with the way they have treated me for over two years. Therefore; I will stand before this racist company and fight them because I will not allow them to think that it is okay to treat blacks especially over the age of 40 the way that they do.

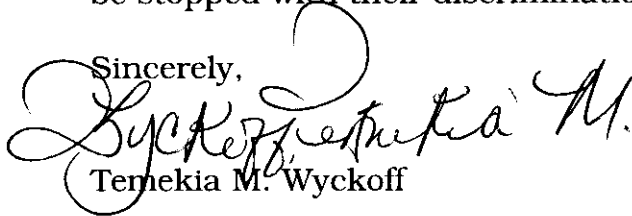
I requested to receive a copy of my Case File on October 14, 2019 through EEOC, Beverly Clark (Government Information Specialist/FOIA Coordinator) and it was received on Wednesday, November 6, 2019. This same date my Case File was received by email, Ms. Beverly Clark c.c. Kate Sanderson (Executive Vice President, Chief Human Resources Officer) the harassment began by Medina Dizdarevic (Caucasian-supervisor, 27-year-old), on Thursday, November 7, 2019 Katie Guffy (Caucasian-senior-ops-lead, 30's) continued the harassment along with Medina Dizdarevic. As a result of the continued harassment and retaliation Amanda Vanthomme (Caucasian-Manager, 30's) and Medina Dizdarevic issued my first disciplinary action (I did not sign) as of Wednesday, November 13, 2019 exactly one week from the date I received a copy of my Case File from the EEOC.

On Thursday, November 14, 2019 I reached out to Ms. Beverly Clark to inform her of R1 leadership behavior and it was suggested to file a "retaliation charge." My new Charge Number is **440-2020-01061**. On December 9, 2019 I received and signed the "agreement to mediate" therefore; R1 should receive the notice of my new charge in the coming days. I suppose you will see me in court again with regards to this new charge.

Since my second filing of my retaliation complaint on November 13, 2019 I have take a leave of absence from R1 as of November 20, 2019; I need a mental break from the discrimination that R1 leadership continue to display against me. I have endured these discriminating acts since February 2018 to present day and enough is enough. I am confident while I am on my leave and finding out that I have filed another complaint against them, R1 will attempt to terminate me as adding to the retaliation.

I truly hope that you will help me with this matter companies like R1 need to be stopped with their discrimination acts.

Sincerely,

A handwritten signature in cursive script, appearing to read "Temekia M. Wyckoff". The signature is written in black ink and is positioned above the printed name.

Temekia M. Wyckoff

EEOC Form 161-B (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Temekia M. Wyckoff
PO Box 563
Southfield, MI 48037

From: Cincinnati Area Office
John W. Peck Fed. Bldg
550 Main St Room 10-019
Cincinnati, OH 45202

☐ On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

471-2019-03071

Matthew G. Meisman,
Investigator

(513) 914-6009

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

- ☐ More than 180 days have passed since the filing of this charge.
- ☒ Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.
- ☒ The EEOC is terminating its processing of this charge.
- ☐ The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:

- ☒ The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.
- ☐ The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

SEP 19 2019



Enclosures(s)

Melanie L. Breen,
Area Office Director

(Date Mailed)

cc: Kate Sanderson
Executive Vice President, Chief Human Resources Officer
R1 RCM
401 North Michigan Ave
Chicago, IL 60611

Janice L. Sterling
Starr, Butler, Alexopoulos and Stoner, PLLC
20700 Civic Center Drive Suite 290
Southfield, MI 48076



**U.S. Equal Employment Opportunity Commission
Detroit Field Office**

477 Michigan Avenue
Room 865
Detroit, MI 48226
(313) 226-4600
TTY (313) 226-7599
Fax (313) 226-2778

November 6, 2019

Temekia M. Wyckoff
PO Box 563
Southfield, MI 48037

Re: Section 83 No.: A20-01-0001
Temekia M. Wyckoff v. R1 RCM

Dear Ms. Wyckoff:

Thank you for your request dated **October 14, 2019** concerning charge number(s) **471-2019-03071**. You requested file disclosure under Section 83 of the Equal Employment Opportunity Commission's Compliance Manual.

The information you requested is enclosed.

If you have asked for the enclosed documents from your charge file before you have filed a lawsuit based on your charge, by accepting these documents you agree that you will use them only in conjunction with contemplated litigation and will only show them to the persons in a privileged relationship, such as a spouse, clergy, or medical, financial or legal advisor.

If you have any further questions, I can be reached at the number listed below.

Sincerely,

A handwritten signature in cursive script, reading "Beverly Clark", is written over a horizontal line.

Beverly Clark
Government Information Specialist for
District Director

Office Hours: Monday – Friday, 8:00 a.m. - 3:30 p.m.

I greatly appreciate you responding back to me.

I am not sure of the dollar amount because I do not know what each complaint is worth. Hopefully; I am seeking to be whole. I will have to consult with my attorney. Did they suggest a dollar figure so that I can take this information to my attorney?

Sincerely,

Ms. Wyckoff
313-468-0673

Sent from my T-Mobile 4G LTE Device

Good morning Mr. Meisman, I greatly appreciate you responding back to me. I am not sure of the dollar amount because I do not know what each complaint is worth. Hopefully; I am seeking to be whole. I will have to consult with my attorney. Did they suggest a dollar figure so that I can take this information to my attorney? Sincerely, Ms. Wyckoff 313-468-0673 Sent from my T-Mobile 4G LTE Device

----- Original message -----

From: MATTHEW MEISMAN <MATTHEW.MEISMAN@EEOC.GOV>

Date: 8/21/19 9:51 AM (GMT-05:00)

To: mswyckoff1017 <mswyckoff1017@aol.com>

Subject: RE: Charge # 471-2019-3071

Ms. Wyckoff,

The case is one of several cases that has been reassigned to me from the Detroit office for investigation. R1's attorney has been in contact and is interested in settling the case. What are you seeking to resolve the case?

Thanks,

Matthew Meisman, Investigator
U S Equal Employment Opportunity Commission
550 Main Street Room 10019
Cincinnati, OH 45202-3122
(513)914-6009
Fax (513)246-0218

From: mswyckoff1017 <mswyckoff1017@aol.com>

Sent: Tuesday, August 20, 2019 7:56 AM

To: MATTHEW MEISMAN <MATTHEW.MEISMAN@EEOC.GOV>

Subject: Charge # 471-2019-3071

Hello Mr. Meisman,

My name is Temekia M. Wyckoff; Ms. Kimberly Nicholson informed me that you are handling my complaint against my current employer, R1.

I would like to know if you can give me an update of my complaint? I signed all the required documents regarding the agreement to mediate.

Thank you,

Temekia M. Wyckoff
313-468-0673

Sent from my T-Mobile 4G LTE Device

----- Original message -----

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Temekia M. Wyckoff

(b) County of Residence of First Listed Plaintiff Oakland
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

PRO SE LITIGANT

DEFENDANTS

R1 RCM
c/o Joseph Flanagan-President & Chief Executive Officer
401 N. Michigan Ave., Suite 2700 Chicago, IL 60611

Case:2:19-cv-13633

Judge: Lawson, David M.

MJ: Patti, Anthony P.

Filed: 12-10-2019 At 02:43 PM

CMP WYCKOFF V R1 RCM INC, ET AL (af

)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|---------------------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input checked="" type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS--Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title VII of the Civil Rights Act of 1964

Brief description of cause:

I have been denied promotions due to my race and age and since I have filed with the EEOC my current employer continue to retaliate, against me

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ 300,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

December 10, 2019

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

1. Is this a case that has been previously dismissed? ☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.) ☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :
